



Notice of Service of Process

null / ALL
Transmittal Number: 23122755
Date Processed: 04/28/2021

Primary Contact: Jeff Allen
Marketplace Holdings, Inc.
1021 Cambridge Sq
Alpharetta, GA 30009-1860

Entity:	Rocky Top Waffles, LLC Entity ID Number 2157409
Entity Served:	Rocky Top Waffles, LLC
Title of Action:	Janet Shaw vs. Rocky Top Waffles, LLC
Document(s) Type:	Summons/Complaint
Nature of Action:	Personal Injury
Court/Agency:	Washington County Circuit Court, TN
Case/Reference No:	40703
Jurisdiction Served:	Tennessee
Date Served on CSC:	04/26/2021
Answer or Appearance Due:	30 Days
Originally Served On:	CSC
How Served:	Certified Mail
Sender Information:	Gabriel C. (Gabe) Stapleton 423-586-5800

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To avoid potential delay, please do not send your response to CSC

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

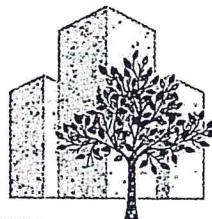
Attorneys:

Charles R. Terry
1933 - 2009

Denise S. Terry
F. Braxton Terry
Jacqulyn G. Jones
T. Dillon Parker
Gabriel C. Stapleton*

Legal Assistant:
Chuck Terry

*also admitted in SC



THE
TERRY LAW FIRM

PERSONAL INJURY ATTORNEYS

*small town firm,
big city know how*
April 21, 2021

116 East Main Street
PO Box 724
Morristown, TN 37815

423.586.5800
800.518.3779
Fax: 423.587.4714

www.terry-lawfirm.com

Corporation Service Company
2908 Poston Avenue
Nashville, TN 37203-1312

Via certified mail

RE: Janet Shaw v. Rocky Top Waffles, LLC and Marketplace Investments, LLC
Washington County Circuit Court No: 40703

Dear Corporation Service Company:

I am enclosing a copy of a Complaint and Summons filed against Collis Foods, LLC.

As you will notice, the Summons requires you to file an answer within 30 days after service. You should turn this letter, Summons and Complaint over to your attorney immediately.

With kindest personal regards, I remain

Yours very truly,

A handwritten signature in black ink, appearing to read "Gabe Stapleton".

Gabriel C. (Gabe) Stapleton

GCS/kam

Enclosures

9

IN THE CIRCUIT COURT FOR WASHINGTON COUNTY, TENNESSEE
AT JONESBOROUGH

JANET SHAW,)
Plaintiff,)
vs.) NO. 40703
ROCKY TOP WAFFLES, LLC and) JURY TRIAL DEMANDED
COLLIS FOODS, LLC,)
Defendants.)
Filed 9 day of
April 2021 at
3:00 o'clock P M

SUMMONS

Brenda Downes, Clerk

To the above-named Defendant: Rocky Top Waffles, LLC
Serve: Rocky Top Waffles, LLC Corporation Service Company 2908 Poston Avenue Nashville, TN 37203

You are hereby summoned and required to serve upon: Denise S. Terry, Plaintiff's attorney, whose address is P.O. Box 724, Morristown, Tennessee 37815-0724, a true copy of the answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. You will file the original with the Court.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Issued this the 9 day of April, 2021, at 3:00 o'clock, P .m.

*Brenda Downes Amy Briger/c
Clerk*

(This summons is issued pursuant to Rule 4 of the Tennessee Rules of Civil Procedure.)

NOTICE

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

Received this _____ day of _____, 2021.

_____, Deputy Sheriff

RETURN ON SERVICE OF SUMMONS

I hereby certify and return that on the _____ day of _____, 2021, I served this summons together with the complaint as follows: _____ or failed to serve this summons within 30 days after its issuance because _____.

_____, Deputy Sheriff



ADA - IF YOU HAVE A DISABILITY AND
REQUIRE ASSISTANCE, PLEASE CONTACT
(423) 788-1415

DEFENDANT'S COPY

IN THE CIRCUIT COURT FOR WASHINGTON COUNTY, TENNESSEE
AT JONESBOROUGH

JANET SHAW,

vs.

ROCKY TOP WAFFLES, LLC and
COLLIS FOODS, INCORPORATED

Defendants.

)
Plaintiff,
)
)
vs.
)
ROCKY TOP WAFFLES, LLC and
COLLIS FOODS, INCORPORATED
Defendants.

No. 40703
Jury Trial Demanded

Filed 9 day of

April 2021 at _____

3:00 o'clock P M

Brenda Downes, Clerk

COMPLAINT

COMES NOW the Plaintiff, **Janet Shaw**, and brings this civil action against the Defendants, **Rocky Top Waffles, LLC** and **Collis Foods, Incorporated**, and hereby files a copy of her Complaint, certified by her attorney as being true and correct for the purpose of accompanying the summons.

1. This is a cause of action for personal injuries arising out of an accident that occurred on or about November 23, 2020.

PARTIES

2. Plaintiff, **Janet Shaw** is, and was at all times relevant hereto, a citizen and resident of Washington County, Tennessee residing at 2914 Watauga Road, Apt. 901, Johnson City, Tennessee 37601.

3. Defendant **Rocky Top Waffles, LLC**, is a limited liability company formed under the laws of Georgia doing business in Tennessee with its principal place of business located at 620 Cherokee Blvd Ste. S-100 Chattanooga TN 37405 and can be served via its registered agent, Corporation Service Company, located at 2908

I HEREBY CERTIFY THAT THIS IS A TRUE AND
EXACT COPY OF THE ORIGINAL DOCUMENT AS
IT APPEARS AT THE WASHINGTON COUNTY
CIRCUIT COURT
BRENDA DOWNES, CLERK

EE TERRY LAW FIRM
ATTORNEYS AT LAW
118 EAST MAIN STREET
POST OFFICE BOX 724
DERRISTOWN, TENNESSEE
37815-0724

Poston Ave., Nashville, TN 37203.

4. Defendant **Collis Foods, LLC**, is a limited liability company formed under the laws of Georgia doing business in Tennessee with its principal place of business located at 4314 American Way, Memphis, TN 38118 and can be served via its registered agent, Corporation Service Company, located at 40 Technology Parkway South, #300, Norcross, GA 30092.

FACTS

5. On or about November 23, 2020, Plaintiff was an invitee at Waffle House #1121 located at 510 N. State of Franklin Road in Johnson City, Tennessee.

6. At one point, Plaintiff, Janet Shaw, was exiting the restaurant, and was attempting to navigate toward the vehicle she was going to leave in, with her husband Charles Shaw.

7. As Mrs. Shaw was attempting to enter the vehicle she fell.

8. This fall was on or near the handicap ramp located near the primary area of ingress and egress.

COUNT I (Premises Liability)

9. Plaintiff hereby incorporates by reference all previous paragraphs as if fully set forth herein.

10. Defendants were conducting business in Washington County, Tennessee.

11. Defendants owed a duty to Plaintiff to maintain the premises in a safe condition and to protect Plaintiff from known hazards and hazards of which Defendants

should have known.

12. Defendants carelessly, negligently, and recklessly occupied, managed, maintained, supervised, constructed, inspected, and/or controlled the parking area and side walk surrounding Waffle House #1121 in such a manner as to create an unreasonably dangerous condition.

13. Defendants, in the exercise of reasonable care and diligence, knew or should have known of the unreasonably dangerous condition and could and should have remedied the condition prior to Plaintiff's fall.

14. Defendants carelessly, negligently, and recklessly failed and refused to protect Plaintiff from, or warn Plaintiff of, the unreasonably dangerous condition on the premises, which directly and proximately caused injuries and damages to Plaintiff.

15. Defendants had actual and/or constructive knowledge of the unreasonably dangerous condition.

16. Defendants breached their duty of care to Plaintiff when Defendants failed to remedy the unreasonably dangerous condition that existed on Defendants' premises.

17. Defendants breached their duty of care to Plaintiff when Defendants failed to warn Plaintiff of the unreasonably dangerous condition that existed on Defendants' premises.

18. Plaintiff suffered serious injuries as a direct and proximate result of the accident, incurred and will continue to incur significant medical expenses, suffered and will continue to suffer losses in the enjoyment of her life, suffered losses in her capacity to earn income/conduct business, and has experienced and will continue to

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experience significant pain and discomfort.

19. At the time the Defendants built this restaurant and/or had this restaurant built, Defendant had a legal duty to comply with the accessibility requirements of the Americans with Disabilities Act (ADA), 36 CFR 1191.1 et seq.

20. The front sidewalk, handicap ramp, and curb area did not comply with the accessibility requirements of the Americans with Disabilities Act, and/or all other applicable standards and regulations..

WHEREFORE, the Plaintiff, **Janet Shaw**, asks for judgment against the Defendants in an amount of no less than Four Hundred and Twenty-Five Thousand Dollars (\$425,000) and asks for a jury in the trial of this cause.

Respectfully submitted,

Gabriel C. (Gabe) Stapleton, BPR# 038102

Of Counsel:

THE TERRY LAW FIRM
116 East Main Street
P.O. Box 724
Morristown, TN 37815
423-586-5800/423-587-4714
gabe@terry-lawfirm.com

COST BOND

We acknowledge ourselves as sureties in this cause for the bill of costs.

Gabriel C. (Gabe) Stapleton

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MORRISTOWN, TENNESSEE
37815-0724

IN THE CIRCUIT COURT FOR WASHINGTON COUNTY, TENNESSEE
AT JONESBOROUGH

JANET SHAW,)
vs.) Plaintiff,)
ROCKY TOP WAFFLES, LLC and)
COLLIS FOODS, INCORPORATED,)
Defendants.)
)
)
)
)
)
 No. 40703
 Jury Trial Demanded

**PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS AND THINGS**

COMES NOW the Plaintiff, by and through counsel, and, in accordance with Rule 33 and Rule 34 of the *Tennessee Rules of Civil Procedure*, submits the following Interrogatories and Request for Production of Documents and Things to the Defendants to be answered within (30) days after the service of same.

PRELIMINARY MATTERS AND DEFINITIONS

The following interrogatories and request for production of documents shall be deemed to be continuing, and any information, including any conclusions, opinions, or contentions that are different from those set forth in answers relating in any way to these interrogatories, which the Defendant acquires subsequent to the date of answering these interrogatories and up to and including the date of trial, shall be furnished to the Plaintiff promptly after such information is acquired.

Answer each Interrogatory. No question is to be left blank. If the answer to an Interrogatory is "none" or "unknown", that must be written as the answer. If the Interrogatory is inapplicable, "N/A" must be written in the answer.

Whenever a date, amount or other computation or figure is requested, the exact date, amount, computation or figure is to be given unless it is unknown. If the exact date, amount, computation or figure is unknown, please give your best estimate or approximation and note that your answer is an estimate or approximation.

If an interrogatory, or a portion thereof, cannot be answered fully, please answer to the extent possible and state the specific reason(s) that a complete answer is not provided. If you object to providing certain information under claim of privilege, please identify the information or documents with sufficient specificity so as to permit the Court to determine the applicability of your asserted objection.

"Person" shall include an individual, corporation, partnership, or any other entity.

"Date" shall include the day, month, and year, if ascertainable, or if not, the best approximation thereof, including its relationship to other events.

The term "document" or "documentary materials" shall include any writing or any other tangible thing (including tape recordings, computer printouts, programs and data banks), of any kind or nature, however produced or reproduced, in the possession of or under the control or right to control of the Defendant. The term "document" or "documents" shall also include copies of any document, if the copies differ in any way from the original by reason of additional writing, notations, additions, corrections, deletions, or otherwise.

"Identify", with respect to a person, shall mean to state his or her name, business title, current or last known home and business addresses, telephone number,

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and if different, the employer, title and business address of such individual at the time he or she participated in the relevant events.

When used in these Interrogatories, the term "defendant" or "you", its plural or any synonyms thereof, is intended to and shall embrace and include, in addition to the named party, counsel for said party, and all agents, servants, employees, representatives, investigators and others who are in possession of or may have obtained information for or on behalf of the named party.

"Communication" means any transmission of information by oral, graphic, written, pictorial or otherwise perceptible means, including but not limited to telephone conversations, letters, e-mails, memoranda, telegrams, meetings and personal conversations.

If any of these interrogatories or requests for production are not answered on the basis of privilege, please include in your response to each such interrogatory or request for production a written statement evidencing:

- a. The nature of the communication or thing;
- b. The date of the communication or thing;
- c. The identity of the persons present at such communication; and,
- d. A brief description of the communication or thing sufficient to allow the Court to rule on a motion to compel.

Where facts set forth in the answers or portions thereof are supplied on information and belief, rather than upon Defendant's knowledge, it should so state, and specifically identify and describe the sources of such information and belief. Should the Defendant be unable to answer any interrogatory or portion thereof by

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either actual knowledge or upon information and belief, the Defendant should so state in detail its efforts to obtain such knowledge as would enable it to answer said interrogatories or portions thereof.

"**Incident**" refers to the allegations contained in Plaintiff's Complaint, specifically those allegations contained in paragraphs 5-6.

"**Premises**" refers to the location of Waffle House #1121 at 510 N. State of Franklin Road, Johnson City, TN 37604.

INTERROGATORIES

INTERROGATORY NO. 1: Identify each person who prepared, consulted, or assisted in the preparation of the responses to these interrogatories including his or her full name, residential address, business address, occupation, and job title or position with the Defendants.

ANSWER:

INTERROGATORY NO. 2: Identify the owner(s) and property manager(s) of the premises at the time of the incident and presently.

ANSWER:

INTERROGATORY NO. 3: State whether the Defendant(s) exercised control over the premises when the incident occurred.

ANSWER:

INTERROGATORY NO. 4: Identify any witnesses known to you who observed the incident. If any witnesses are employees and/or agents of the Defendant(s), then state whether they are currently employed by the Defendant(s).

ANSWER:

INTERROGATORY NO. 5: Identify all persons known to you who were at the premises within two hours prior to the incident, at the time of the incident, and two hours subsequent to the incident.

ANSWER:

INTERROGATORY NO. 6: Identify all of Defendants' agents and/or employees who were at the premises on the day of the incident.

ANSWER:

INTERROGATORY NO. 7: Identify all persons who you believe to have knowledge of the incident.

ANSWER:

INTERROGATORY NO. 8: State fully and completely to the best of your knowledge and understanding how the alleged incident occurred, including a chronology of events as they unfolded.

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ANSWER:

INTERROGATORY NO. 9: State whether any inspection was made of the area of the incident on the date of the incident or within a ten (10) day period of time prior or subsequent thereto. If your answer is in the affirmative,

- (a) Identify the person(s) making such inspection;
- (b) State whether a written or oral report was made;

ANSWER:

INTERROGATORY NO. 10: State whether the Defendant received any form of notice, either written or oral, from either of the Plaintiffs or from anyone acting on the Plaintiff's behalf, concerning the incident. If so, provide the date of any receipt, the method by which notice was given, the name and address of the recipient of the notice, the substance of the notice and any response made thereto.

ANSWER:

INTERROGATORY NO. 11: Within the past ten years, state whether the Defendant received or become aware of any claims resulting from injuries alleged to have been suffered by any person(s) at the premises. For each claim:

- (a) State the date of the alleged injury;
- (b) Identify the injured claimant;
- (c) Identify claimant's attorney (if any).

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ANSWER:

INTERROGATORY NO. 12: State whether the Defendant contends that the Plaintiff in any way caused or contributed to the alleged incident or in any way assumed the risk of her injuries. If so, state the basis for each such allegation.

ANSWER:

INTERROGATORY NO. 13: Identify all supervisory personnel whom Defendant employed at the premises at the time of the incident, for one year prior to the incident, for one year subsequent to the incident, and state:

- (a) Whether any such personnel are currently employed by you
- (b) Their present employment position with you
- (c) Their employment position at the time of the occurrence
- (d) Their name, address, and phone number

ANSWER:

INTERROGATORY NO. 14: State whether any visual representations were taken of the scene of the incident or of Plaintiff. If the answer is in the affirmative, identify the person and/or system taking said visual representations.

ANSWER:

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INTERROGATORY NO. 15: State whether there were any reports submitted by any individual regarding the incident.

ANSWER:

INTERROGATORY NO. 16: Provide the name, address, qualifications and areas of expertise of any expert witness whom you intend to call at trial and with respect to each, state the opinion that will be given and the underlying facts upon which each opinion is based.

ANSWER:

INTERROGATORY NO. 17: State any and all facts that support any of the affirmative defenses contained in your Answer.

ANSWER:

INTERROGATORY NO. 18: Identify the individual(s) and/or business entities who constructed and/or installed the sidewalk and parking lot surrounding the premises.

ANSWER:

INTERROGATORY NO. 19: State whether you believe the sidewalk and/or handicap ramp on the premises is compliant with the Americans with Disabilities Act.

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37815-0724

ANSWER:

INTERROGATORY NO. 20: If your answer to the previous interrogatory is in the affirmative, cite the specific provisions of the Americans with Disabilities Act that you believe the sidewalk complies with.

ANSWER:

INTERROGATORY NO. 21: Identify the year the premises was constructed.

ANSWER:

INTERROGATORY NO. 21: Identify any and all building codes that you contend the Waffle House, sidewalk, and parking lot were constructed in compliance with.

ANSWER:

INTERROGATORY NO. 22: Identify any and all building codes, if any, that you believe were applicable at the time the premises was constructed.

ANSWER:

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REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1: Produce any and all photographs, video recordings, and audio recordings that depict the location of the incident on the premises, as it existed at the time of the incident.

ANSWER:

REQUEST FOR PRODUCTION NO. 2: Produce all incident reports relating to any injury(ies) on the premises from any time over past five years, including any report that was completed in connection with Plaintiff's incident.

ANSWER:

REQUEST FOR PRODUCTION NO. 3: Produce any documents that indicate that the Defendants and/or their employees had knowledge that any person was injured at the premises within the past ten years..

ANSWER:

REQUEST FOR PRODUCTION NO. 4: Produce all manuals, policies, procedures, or any other written guidelines, which address customer safety.

ANSWER:

REQUEST FOR PRODUCTION NO. 5: Produce all documents, emails, and any other type of communication that in any way refers to (a) the

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incident and (b) any other instance wherein an individual was injured at Waffle House.

ANSWER:

REQUEST FOR PRODUCTION NO. 6: Produce any reports documenting or memorializing any investigation done regarding the incident.

ANSWER:

REQUEST FOR PRODUCTION NO. 8: Produce any document that states the name, address, and/or job title of any agent and/or employee of Defendant who had contact with Plaintiff before or after the incident.

ANSWER:

REQUEST FOR PRODUCTION NO. 9: Produce all documents, communications, memorabilia, notes, and recordings that contain information responsive to any of the Plaintiff's Interrogatories propounded to the Defendant.

ANSWER:

REQUEST FOR PRODUCTION NO. 10: Produce a copy of the full staffing schedule for the Defendant on the date of the incident.

ANSWER:

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REQUEST FOR PRODUCTION NO. 11: Produce a copy of any documents showing what disciplinary actions were taken against any employee or agent of Defendant for their actions, omissions, violations of policy or procedure, or violations of regulations concerning Plaintiff's incident.

ANSWER:

REQUEST FOR PRODUCTION NO. 12: Produce a copy of Defendant's employee handbook.

ANSWER:

REQUEST FOR PRODUCTION NO. 13: Produce all documents showing what, if any, disciplinary actions have ever been taken against the Defendant by any state, government or regulatory authority regarding the sidewalk or parking area at the premises.

ANSWER:

REQUEST FOR PRODUCTION NO. 14: Produce all construction drawings and/or blueprints that were used to construct the sidewalk and parking lot area surrounding Waffle House.

ANSWER:

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REQUEST FOR PRODUCTION NO. 15: Produce all documents relating to any construction permits for the premises.

ANSWER:

REQUEST FOR PRODUCTION NO. 16: Produce all specifications that were used in constructing the sidewalk and parking lot located on the premises.

ANSWER:

REQUEST FOR PRODUCTION NO. 17: Produce all diagrams of the premises.

ANSWER:

REQUEST FOR PRODUCTION NO. 18: Produce all invoices related to any construction and/or renovations of the sidewalk and parking lot.

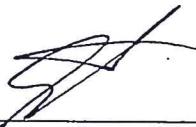
ANSWER:

REQUEST FOR PRODUCTION NO. 19: Produce all citations/notices issued by any entity critical of the design and construction of the sidewalk.

REQUEST FOR PRODUCTION NO. 20: Produce all work/change orders which implemented constructional/design changes in the sidewalk.

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POST OFFICE BOX 724
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Respectfully submitted,



Gabriel C. (Gabe) Stapleton, BPR #038102

Of Counsel:

THE TERRY LAW FIRM
116 East Main Street
P.O. Box 724
Morristown, TN 37815
423-586-5800/423-587-4714
gabe@terry-lawfirm.com

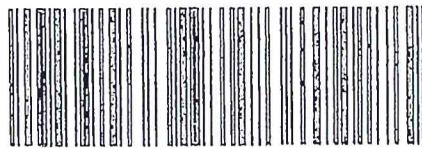
CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Interrogatories and Request for Production of Documents and Things has been served on the Defendants, with service of the Complaint, this the _____ day of April, 2021.

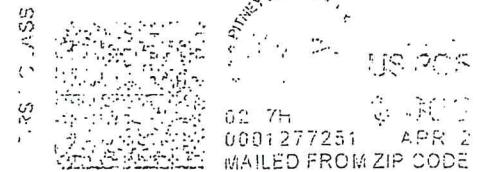


Gabriel C. (Gabe) Stapleton

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9434 7266 9404 2172 3326 25



THE
TERRY LAW FIRM

PERSONAL INJURY ATTORNEYS

116 East Main Street
PO Box 724
Morristown, TN 37815

Corporation Service Company
2908 Poston Avenue
Nashville, TN 37203-1312



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Transmittal Number: 23124095
Date Processed: 04/28/2021

Primary Contact: Jeff Allen
Marketplace Holdings, Inc.
1021 Cambridge Sq
Alpharetta, GA 30009-1860

Entity: Collis Foods, LLC
Entity ID Number 2267232

Entity Served: Collis Foods, LLC

Title of Action: Janet Shaw vs. Rocky Top Waffles, LLC

Document(s) Type: Summons/Complaint

Nature of Action: Personal Injury

Court/Agency: Washington County Circuit Court, TN

Case/Reference No: 40703

Jurisdiction Served: Georgia

Date Served on CSC: 04/26/2021

Answer or Appearance Due: 30 Days

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423-586-5800

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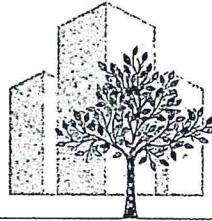
Attorneys:

Charles R. Terry
1933 - 2009

Denise S. Terry
F. Braxton Terry
Jacqulyn G. Jones
T. Dillon Parker
Gabriel C. Stapleton*

Legal Assistant:
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*also admitted in SC



THE
TERRY LAW FIRM

PERSONAL INJURY ATTORNEYS

*small town firm,
big city know how*
April 21, 2021

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Corporation Service Company
40 Technology Parkway South, #300
Norcross, GA 30092

Via certified mail

RE: Janet Shaw v. Rocky Top Waffles, LLC and Marketplace Investments, LLC
Washington County Circuit Court NO: 40703

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With kindest personal regards, I remain

Yours very truly,

Gabriel C. (Gabe) Stapleton

GCS/kam

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IN THE CIRCUIT COURT FOR WASHINGTON COUNTY, TENNESSEE
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JANET SHAW,

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Plaintiff,

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)
NO. 40703
JURY TRIAL DEMANDED

)
Filed 9 day of
April 2021 at
3:00 o'clock P M

SUMMONS

To the above-named Defendant: Collis Foods, LLC

Serve: Collis Foods, LLC Corporation Service Company 40 Technology Parkway South, #300 Norcross, GA 30092

You are hereby summoned and required to serve upon: Denise S. Terry, Plaintiff's attorney, whose address is P.O. Box 724, Morristown, Tennessee 37815-0724, a true copy of the answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. You will file the original with the Court.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Issued this the 9 day of April, 2021, at 3:00'clock, P.m.

Brenda Downes Amy Brugge Clerk

(This summons is issued pursuant to Rule 4 of the Tennessee Rules of Civil Procedure.)

NOTICE

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

Received this _____ day of _____, 2021.

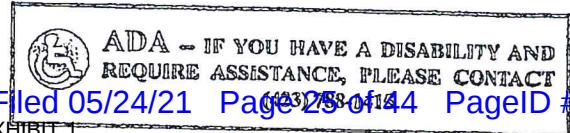
_____, Deputy Sheriff

RETURN ON SERVICE OF SUMMONS

I hereby certify and return that on the _____ day of _____, 2021, I served this summons together with the complaint as follows: _____ or failed to serve this summons within 30 days after its issuance because _____

_____, Deputy Sheriff

DEFENDANT'S COPY



IN THE CIRCUIT COURT FOR WASHINGTON COUNTY, TENNESSEE
AT JONESBOROUGH

JANET SHAW,

vs.

ROCKY TOP WAFFLES, LLC and
COLLIS FOODS, INCORPORATED

Defendants.

)
Plaintiff,
)
)
Defendants.
)

No. 40703
Jury Trial Demanded

Filed 9 day of

April 2021 at

3:00 o'clock P M

Brenda Downes, Clerk

COMPLAINT

COMES NOW the Plaintiff, **Janet Shaw**, and brings this civil action against the Defendants, **Rocky Top Waffles, LLC** and **Collis Foods, Incorporated**, and hereby files a copy of her Complaint, certified by her attorney as being true and correct for the purpose of accompanying the summons.

1. This is a cause of action for personal injuries arising out of an accident that occurred on or about November 23, 2020.

PARTIES

2. Plaintiff, **Janet Shaw** is, and was at all times relevant hereto, a citizen and resident of Washington County, Tennessee residing at 2914 Watauga Road, Apt. 901, Johnson City, Tennessee 37601.

3. Defendant **Rocky Top Waffles, LLC**, is a limited liability company formed under the laws of Georgia doing business in Tennessee with its principal place of business located at 620 Cherokee Blvd Ste. S-100 Chattanooga TN 37405 and can be served via its registered agent, Corporation Service Company located at 2908

HEREBY CERTIFIED THAT THIS IS A TRUE AND
EXACT COPY OF THE ORIGINAL DOCUMENT AS
IT APPEARS AT THE WASHINGTON COUNTY
CIRCUIT COURT
BRENDA DOWNES, CLERK

One B. Downes

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ATTORNEYS AT LAW
116 EAST MAIN STREET
POST OFFICE BOX 724
DERRISTOWN, TENNESSEE
37815-0724

Poston Ave., Nashville, TN 37203.

4. Defendant **Collis Foods, LLC**, is a limited liability company formed under the laws of Georgia doing business in Tennessee with its principal place of business located at 4314 American Way, Memphis, TN 38118 and can be served via its registered agent, Corporation Service Company, located at 40 Technology Parkway South, #300, Norcross, GA 30092.

FACTS

5. On or about November 23, 2020, Plaintiff was an invitee at Waffle House #1121 located at 510 N. State of Franklin Road in Johnson City, Tennessee.

6. At one point, Plaintiff, Janet Shaw, was exiting the restaurant, and was attempting to navigate toward the vehicle she was going to leave in, with her husband Charles Shaw.

7. As Mrs. Shaw was attempting to enter the vehicle she fell.

8. This fall was on or near the handicap ramp located near the primary area of ingress and egress.

COUNT I (Premises Liability)

9. Plaintiff hereby incorporates by reference all previous paragraphs as if fully set forth herein.

10. Defendants were conducting business in Washington County, Tennessee.

11. Defendants owed a duty to Plaintiff to maintain the premises in a safe condition and to protect Plaintiff from known hazards and hazards of which Defendants

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should have known.

12. Defendants carelessly, negligently, and recklessly occupied, managed, maintained, supervised, constructed, inspected, and/or controlled the parking area and side walk surrounding Waffle House #1121 in such a manner as to create an unreasonably dangerous condition.

13. Defendants, in the exercise of reasonable care and diligence, knew or should have known of the unreasonably dangerous condition and could and should have remedied the condition prior to Plaintiff's fall.

14. Defendants carelessly, negligently, and recklessly failed and refused to protect Plaintiff from, or warn Plaintiff of, the unreasonably dangerous condition on the premises, which directly and proximately caused injuries and damages to Plaintiff.

15. Defendants had actual and/or constructive knowledge of the unreasonably dangerous condition.

16. Defendants breached their duty of care to Plaintiff when Defendants failed to remedy the unreasonably dangerous condition that existed on Defendants' premises.

17. Defendants breached their duty of care to Plaintiff when Defendants failed to warn Plaintiff of the unreasonably dangerous condition that existed on Defendants' premises.

18. Plaintiff suffered serious injuries as a direct and proximate result of the accident, incurred and will continue to incur significant medical expenses, suffered and will continue to suffer losses in the enjoyment of her life, suffered losses in her capacity to earn income/conduct business, and has experienced and will continue to

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experience significant pain and discomfort.

19. At the time the Defendants built this restaurant and/or had this restaurant built, Defendant had a legal duty to comply with the accessibility requirements of the Americans with Disabilities Act (ADA), 36 CFR 1191.1 et seq.

20. The front sidewalk, handicap ramp, and curb area did not comply with the accessibility requirements of the Americans with Disabilities Act, and/or all other applicable standards and regulations.

WHEREFORE, the Plaintiff, **Janet Shaw**, asks for judgment against the Defendants in an amount of no less than Four Hundred and Twenty-Five Thousand Dollars (\$425,000) and asks for a jury in the trial of this cause.

Respectfully submitted,

Gabriel C. (Gabe) Stapleton, BPR# 038102

Of Counsel:

THE TERRY LAW FIRM
116 East Main Street
P.O. Box 724
Morristown, TN 37815
423-586-5800/423-587-4714
gabe@terry-lawfirm.com

COST BOND

We acknowledge ourselves as sureties in this cause for the bill of costs.

Gabriel C. (Gabe) Stapleton

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IN THE CIRCUIT COURT FOR WASHINGTON COUNTY, TENNESSEE
AT JONESBOROUGH

JANET SHAW,)
vs.)
ROCKY TOP WAFFLES, LLC and)
COLLIS FOODS, INCORPORATED,)
Defendants.
Plaintiff,)
)
)
)
)
)

No. 40703
Jury Trial Demanded

**PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS AND THINGS**

COMES NOW the Plaintiff, by and through counsel, and, in accordance with Rule 33 and Rule 34 of the *Tennessee Rules of Civil Procedure*, submits the following Interrogatories and Request for Production of Documents and Things to the Defendants to be answered within (30) days after the service of same.

PRELIMINARY MATTERS AND DEFINITIONS

The following interrogatories and request for production of documents shall be deemed to be continuing, and any information, including any conclusions, opinions, or contentions that are different from those set forth in answers relating in any way to these interrogatories, which the Defendant acquires subsequent to the date of answering these interrogatories and up to and including the date of trial, shall be furnished to the Plaintiff promptly after such information is acquired.

Answer each Interrogatory. No question is to be left blank. If the answer to an Interrogatory is "none" or "unknown", that must be written as the answer. If the Interrogatory is inapplicable, "N/A" must be written in the answer.

Whenever a date, amount or other computation or figure is requested, the exact date, amount, computation or figure is to be given unless it is unknown. If the exact date, amount, computation or figure is unknown, please give your best estimate or approximation and note that your answer is an estimate or approximation.

If an interrogatory, or a portion thereof, cannot be answered fully, please answer to the extent possible and state the specific reason(s) that a complete answer is not provided. If you object to providing certain information under claim of privilege, please identify the information or documents with sufficient specificity so as to permit the Court to determine the applicability of your asserted objection.

"Person" shall include an individual, corporation, partnership, or any other entity.

"Date" shall include the day, month, and year, if ascertainable, or if not, the best approximation thereof, including its relationship to other events.

The term "document" or "documentary materials" shall include any writing or any other tangible thing (including tape recordings, computer printouts, programs and data banks), of any kind or nature, however produced or reproduced, in the possession of or under the control or right to control of the Defendant. The term "document" or "documents" shall also include copies of any document, if the copies differ in any way from the original by reason of additional writing, notations, additions, corrections, deletions, or otherwise.

"Identify", with respect to a person, shall mean to state his or her name, business title, current or last known home and business addresses, telephone number,

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and if different, the employer, title and business address of such individual at the time he or she participated in the relevant events.

When used in these Interrogatories, the term "defendant" or "you", its plural or any synonyms thereof, is intended to and shall embrace and include, in addition to the named party, counsel for said party, and all agents, servants, employees, representatives, investigators and others who are in possession of or may have obtained information for or on behalf of the named party.

"Communication" means any transmission of information by oral, graphic, written, pictorial or otherwise perceptible means, including but not limited to telephone conversations, letters, e-mails, memoranda, telegrams, meetings and personal conversations.

If any of these interrogatories or requests for production are not answered on the basis of privilege, please include in your response to each such interrogatory or request for production a written statement evidencing:

- a. The nature of the communication or thing;
- b. The date of the communication or thing;
- c. The identity of the persons present at such communication; and,
- d. A brief description of the communication or thing sufficient to allow the Court to rule on a motion to compel.

Where facts set forth in the answers or portions thereof are supplied on information and belief, rather than upon Defendant's knowledge, it should so state, and specifically identify and describe the sources of such information and belief. Should the Defendant be unable to answer any interrogatory or portion thereof by

either actual knowledge or upon information and belief, the Defendant should so state in detail its efforts to obtain such knowledge as would enable it to answer said interrogatories or portions thereof.

"**Incident**" refers to the allegations contained in Plaintiff's Complaint, specifically those allegations contained in paragraphs 5-6.

"**Premises**" refers to the location of Waffle House #1121 at 510 N. State of Franklin Road, Johnson City, TN 37604.

INTERROGATORIES

INTERROGATORY NO. 1: Identify each person who prepared, consulted, or assisted in the preparation of the responses to these interrogatories including his or her full name, residential address, business address, occupation, and job title or position with the Defendants.

ANSWER:

INTERROGATORY NO. 2: Identify the owner(s) and property manager(s) of the premises at the time of the incident and presently.

ANSWER:

INTERROGATORY NO. 3: State whether the Defendant(s) exercised control over the premises when the incident occurred.

ANSWER:

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INTERROGATORY NO. 4: Identify any witnesses known to you who observed the incident. If any witnesses are employees and/or agents of the Defendant(s), then state whether they are currently employed by the Defendant(s).

ANSWER:

INTERROGATORY NO. 5: Identify all persons known to you who were at the premises within two hours prior to the incident, at the time of the incident, and two hours subsequent to the incident.

ANSWER:

INTERROGATORY NO. 6: Identify all of Defendants' agents and/or employees who were at the premises on the day of the incident.

ANSWER:

INTERROGATORY NO. 7: Identify all persons who you believe to have knowledge of the incident.

ANSWER:

INTERROGATORY NO. 8: State fully and completely to the best of your knowledge and understanding how the alleged incident occurred, including a chronology of events as they unfolded.

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ANSWER:

INTERROGATORY NO. 9: State whether any inspection was made of the area of the incident on the date of the incident or within a ten (10) day period of time prior or subsequent thereto. If your answer is in the affirmative,

- (a) Identify the person(s) making such inspection;
- (b) State whether a written or oral report was made;

ANSWER:

INTERROGATORY NO. 10: State whether the Defendant received any form of notice, either written or oral, from either of the Plaintiffs or from anyone acting on the Plaintiff's behalf, concerning the incident. If so, provide the date of any receipt, the method by which notice was given, the name and address of the recipient of the notice, the substance of the notice and any response made thereto.

ANSWER:

INTERROGATORY NO. 11: Within the past ten years, state whether the Defendant received or become aware of any claims resulting from injuries alleged to have been suffered by any person(s) at the premises. For each claim:

- (a) State the date of the alleged injury;
- (b) Identify the injured claimant;
- (c) Identify claimant's attorney (if any).

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ANSWER:

INTERROGATORY NO. 12: State whether the Defendant contends that the Plaintiff in any way caused or contributed to the alleged incident or in any way assumed the risk of her injuries. If so, state the basis for each such allegation.

ANSWER:

INTERROGATORY NO. 13: Identify all supervisory personnel whom Defendant employed at the premises at the time of the incident, for one year prior to the incident, for one year subsequent to the incident, and state:

- (a) Whether any such personnel are currently employed by you
- (b) Their present employment position with you
- (c) Their employment position at the time of the occurrence
- (d) Their name, address, and phone number

ANSWER:

INTERROGATORY NO. 14: State whether any visual representations were taken of the scene of the incident or of Plaintiff. If the answer is in the affirmative, identify the person and/or system taking said visual representations.

ANSWER:

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INTERROGATORY NO. 15: State whether there were any reports submitted by any individual regarding the incident.

ANSWER:

INTERROGATORY NO. 16: Provide the name, address, qualifications and areas of expertise of any expert witness whom you intend to call at trial and with respect to each, state the opinion that will be given and the underlying facts upon which each opinion is based.

ANSWER:

INTERROGATORY NO. 17: State any and all facts that support any of the affirmative defenses contained in your Answer.

ANSWER:

INTERROGATORY NO. 18: Identify the individual(s) and/or business entities who constructed and/or installed the sidewalk and parking lot surrounding the premises.

ANSWER:

INTERROGATORY NO. 19: State whether you believe the sidewalk and/or handicap ramp on the premises is compliant with the Americans with Disabilities Act.

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ANSWER:

INTERROGATORY NO. 20: If your answer to the previous interrogatory is in the affirmative, cite the specific provisions of the Americans with Disabilities Act that you believe the sidewalk complies with.

ANSWER:

INTERROGATORY NO. 21: Identify the year the premises was constructed.

ANSWER:

INTERROGATORY NO. 21: Identify any and all building codes that you contend the Waffle House, sidewalk, and parking lot were constructed in compliance with.

ANSWER:

INTERROGATORY NO. 22: Identify any and all building codes, if any, that you believe were applicable at the time the premises was constructed.

ANSWER:

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REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1: Produce any and all photographs, video recordings, and audio recordings that depict the location of the incident on the premises, as it existed at the time of the incident.

ANSWER:

REQUEST FOR PRODUCTION NO. 2: Produce all incident reports relating to any injury(ies) on the premises from any time over past five years, including any report that was completed in connection with Plaintiff's incident.

ANSWER:

REQUEST FOR PRODUCTION NO. 3: Produce any documents that indicate that the Defendants and/or their employees had knowledge that any person was injured at the premises within the past ten years..

ANSWER:

REQUEST FOR PRODUCTION NO. 4: Produce all manuals, policies, procedures, or any other written guidelines, which address customer safety.

ANSWER:

REQUEST FOR PRODUCTION NO. 5: Produce all documents, e-mails, and any other type of communication that in any way refers to (a) the

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incident and (b) any other instance wherein an individual was injured at Waffle House.

ANSWER:

REQUEST FOR PRODUCTION NO. 6: Produce any reports documenting or memorializing any investigation done regarding the incident.

ANSWER:

REQUEST FOR PRODUCTION NO. 8: Produce any document that states the name, address, and/or job title of any agent and/or employee of Defendant who had contact with Plaintiff before or after the incident.

ANSWER:

REQUEST FOR PRODUCTION NO. 9: Produce all documents, communications, memorabilia, notes, and recordings that contain information responsive to any of the Plaintiff's Interrogatories propounded to the Defendant.

ANSWER:

REQUEST FOR PRODUCTION NO. 10: Produce a copy of the full staffing schedule for the Defendant on the date of the incident.

ANSWER:

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REQUEST FOR PRODUCTION NO. 11: Produce a copy of any documents showing what disciplinary actions were taken against any employee or agent of Defendant for their actions, omissions, violations of policy or procedure, or violations of regulations concerning Plaintiff's incident.

ANSWER:

REQUEST FOR PRODUCTION NO. 12: Produce a copy of Defendant's employee handbook.

ANSWER:

REQUEST FOR PRODUCTION NO. 13: Produce all documents showing what, if any, disciplinary actions have ever been taken against the Defendant by any state, government or regulatory authority regarding the sidewalk or parking area at the premises.

ANSWER:

REQUEST FOR PRODUCTION NO. 14: Produce all construction drawings and/or blueprints that were used to construct the sidewalk and parking lot area surrounding Waffle House.

ANSWER:

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REQUEST FOR PRODUCTION NO. 15: Produce all documents relating to any construction permits for the premises.

ANSWER:

REQUEST FOR PRODUCTION NO. 16: Produce all specifications that were used in constructing the sidewalk and parking lot located on the premises.

ANSWER:

REQUEST FOR PRODUCTION NO. 17: Produce all diagrams of the premises.

ANSWER:

REQUEST FOR PRODUCTION NO. 18: Produce all invoices related to any construction and/or renovations of the sidewalk and parking lot.

ANSWER:

REQUEST FOR PRODUCTION NO. 19: Produce all citations/notices issued by any entity critical of the design and construction of the sidewalk.

REQUEST FOR PRODUCTION NO. 20: Produce all work/change orders which implemented constructional/design changes in the sidewalk.

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Respectfully submitted,



Gabriel C. (Gabe) Stapleton, BPR #038102

Of Counsel:

THE TERRY LAW FIRM
116 East Main Street
P.O. Box 724
Morristown, TN 37815
423-586-5800/423-587-4714
gabe@terry-lawfirm.com

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Interrogatories and Request for Production of Documents and Things has been served on the Defendants, with service of the Complaint, this _____ day of April, 2021.



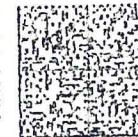
Gabriel C. (Gabe) Stapleton

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